

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA,

CASE NO.: 1:23-CR-00056-JKB

vs.

BRANDON CLINT RUSSELL,

BRANDON RUSSELL’S MOTION TO SUSPEND CERTAIN TRIAL DATES

Brandon Clint Russell hereby files this Motion to suspend the trial dates of July 15th and July 19th. In support of this Motion, undersigned counsel states as follows:

1. This case is scheduled for Jury Trial beginning July 8, 2024, and is expected to last four weeks.
2. The Court entered an Order suspending the trial dates of July 16th through July 18th due to a conflict in the Court’s schedule. (Dkt. No. 77)
3. As the Court is aware, undersigned counsel works and resides in the Southern District of Florida, and will be staying in a hotel for the entire trial period.
4. By suspending the July 16 to July 18 trial dates, the Court has extended the trial period for approximately one week.
5. Because the Court has already suspended the trial on Tuesday, Wednesday, and Thursday of the week of July 15th, defense counsel requests that the dates of July 15th (Monday) and July 19th (Friday) also be suspended. This will allow defense counsel to return to Florida that week, which will save Mr. Russell’s family a significant amount of money paying for a hotel room, meals, and other expenses for a period of nine days (Saturday, July 13th through Sunday July 21st). This financial savings is significant to

Mr. Russell's family, which is already expending a large amount of money to cover the costs of counsel residing in Baltimore throughout the trial period. It would also provide jurors with an opportunity to return to their normal work and personal schedules during a week where three days have already been suspended.

6. The undersigned counsel has discussed this matter with the government. It opposes this Motion.

Wherefore, counsel respectfully requests that the Jury Trial in this matter be suspended on July 15th and July 19th.

Dated: April 9th, 2024

Respectfully submitted,

/s/ Ian J. Goldstein

Ian J. Goldstein (Admitted *pro hac vice*)

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/s/Kobie A. Flowers

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Counsel for Brandon Russell

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed via CM/ECF which will serve all parties of record on this 9th day of April, 2024.

Respectfully submitted,

/s/ Ian J. Goldstein

Ian J. Goldstein (Admitted *pro hac vice*)

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